REMARKS

I.   Status of Claims

Claim 3 has been amended.

Claims 1, 2 and 12-14 have been cancelled

Claims 3-11 are thus pending in the application.

In the Office Action, the Examiner objected to Figures 1 and 7. Claims 1, 2 and 12-14 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Publication No. 2002/0106202 to Hunter. Claims 3-11 were also rejected under 35 U.S.C. § 103(a) as being unpatentable over Hunter in view of U.S. Publication No. 2003/0008662 to Stern et al. ("Stern").

II.   Drawing Objections

The Examiner objected to Figures 1 and 7 in the drawings by asserting that the figures should be designated by a legend such as --Prior Art-- because only that which is old is illustrated.

Applicants respectfully submit that Figures 1 and 7 have been amended by adding the legend --CONVENTIONAL ART--. Applicants request that the objection to the drawings be withdrawn.

III.   Specification Objections

The Examiner asserted in the office action that the use of the trademark Bluetooth should be capitalized where it appears in the specification because the proprietary nature of the trademark should be respected.

Accordingly, the specification has been amended at page 4, lines 25 – page 5, line 4, page 8, lines 7-19 and 20-24, and page 12, lines 7-10 by changing "Bluetooth" to -- BLUETOOTH--.

IV.   Claim Rejections – 35 U.S.C. § 102(b)

The Examiner rejected claims 1, 2 and 12-14 under 35 U.S.C. § 102(b) as being anticipated by Hunter.

Applicants respectfully submit that claims 1, 2 and 12-14 have been cancelled.

V.   Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 3-11 under 35 U.S.C. § 103(a) as being unpatentable over Hunter in view of Stern.

With respect to claim 3, the Examiner admitted that Hunter does not teach the cipher apparatus receiving information from the portable terminal, establishing a secret code, and transmitting enciphered data; and the cipher apparatus receiving information reporting a locked state of the camera and storing and displaying the secret code and a telephone number of the portable terminal. To cure the deficiencies of Hunter, the Examiner alleged that Stern teaches a location policy server receiving information from the portable device and determining a policy for the mobile device based on location information and device information (by referencing Figure 3, reference numerals 304 and 306; and paragraphs [0053]-[0056], [0058] and [0059]; determining whether the mobile device is adhering to the policy give to the mobile device (by referencing Figure 13, reference numerals 1304, 1306 and 1310, and paragraphs [0060], [0082]-[0084], and [0104]-[0108]); and displaying pertinent information at the mobile device (by referencing Figures 5-7, and paragraphs [0073]-[0075]).

Applicants respectfully submit that the alleged combination of <u>Hunter</u> and <u>Stern</u> does not disclose or teach a method in which "a cipher apparatus receiving information from the portable terminal, establishing a secret code, and transmitting data being enciphered comprising the secret code by using information of the portable terminal; the portable terminal receiving the enciphered data and stopping an operation of the camera;" and "the cipher apparatus receiving information reporting a locked state of the camera, and storing and displaying the secret code and a telephone number of the portable terminal," as recited in amended claim 3.

<u>Stern</u> discloses a mobile user device that operates in accordance with a location policy and user device information. The location policy refers to a rule or other type of information referring to the operation of a mobile user device within proximity to a location device. A location device may evaluate user device information and transmit an appropriate location policy to a mobile user device. Also, the location device may simply determine whether or not a location policy will be applied based on the user device information. The location device determining a **location policy** of <u>Stern</u> is not analogous to a **cipher apparatus**. A cipher apparatus employs a key (enciphered data), which encrypts information to make the information unreadable to anyone (secret code). The cipher apparatus transmits enciphered data, which includes the camera locking secret code to the control unit of the camera. There is nothing in <u>Stern</u> that discloses or teaches that the location policy comprises enciphered data, and the location device in <u>Stern</u> does not encrypt information. Accordingly, <u>Stern</u> does not supply the deficiencies of <u>Hunter</u>.

In view of the above arguments, the alleged combination of <u>Hunter</u> and <u>Stern</u>, taken singly or in combination, does not disclose or teach the recitations of claim 3. Therefore, the rejection of claim 3 should be withdrawn. Also, the rejection of claims 4-7, which incorporation the limitations of claim 3, should also be withdrawn for at least the same reasons given for claim 3.

With respect to claim 8, the Examiner admitted that <u>Hunter</u> does not teach enciphering the data, receiving information, and obtaining a secret code for the locked state of the camera from a database. To cure the deficiencies of <u>Hunter</u>, the Examiner alleged that <u>Stern</u> teaches receiving information regarding the mobile user device (by referencing paragraphs [0012] and [0053]) and finding policy based on the device and location information in a database which is sent to the mobile device (by referencing Figure 3, reference numerals 304 and 306, Figure 4, reference numerals 800 and 900, and paragraphs [0053] – [0056], [0058] and [0059]).

Applicants respectfully submit that the alleged combination of <u>Hunter</u> and <u>Stern</u> does not disclose or teach "a cipher apparatus" and a method in which "the cipher apparatus receiving information of the portable terminal, and obtaining a secret code for the locked state of the camera from a database; the cipher apparatus transmitting enciphered data obtained from the secret code; the portable terminal receiving and deciphering the enciphered data, and comparing the secret code received from the cipher apparatus with one of the secret codes stored in the memory;" and "enabling the camera to operate when the secret code matches said one of the secret codes stored in the memory," as recited.

<u>Hunter</u> discloses enabling and disabling a camera's functions according to data stored on a smart card. The stored data relates to permitted camera functions within a predetermined area. Also, a camera's functions can be enabled and disabled according to a signal transmitted by a remote transmitter to a receiver comprised in a unit housed within the camera. *See* paragraphs [0036] and [0037]. However, there is nothing in <u>Hunter</u> that discloses or teaches a cipher apparatus, enciphering data, and deciphering the enciphered data. Accordingly, there is nothing in <u>Hunter</u> that discloses the recitations of claim 8.

<u>Stern</u> does not cure the deficiencies of <u>Hunter</u>. Again, <u>Stern</u> discloses a mobile user device that operates in accordance with a location policy and user device information. The

location policy refers to a rule or other type of information referring to the operation of a mobile user device within proximity to a location device. A location device may evaluate user device information and transmit an appropriate location policy to a mobile user device. Also, the location device may simply determine whether or not a location policy will be applied based on the user device information. The location device determining a location policy of <u>Stern</u> is not analogous to a cipher apparatus. A cipher apparatus employs a key (enciphered data), which encrypts information to make the information unreadable to anyone (secret code). The cipher apparatus transmits enciphered data, which includes the camera locking secret code to the control unit of the camera. There is nothing in <u>Stern</u> that discloses or teaches that the location policy comprises enciphered data. Moreover, the location device in <u>Stern</u> does not encrypt information. Accordingly, <u>Stern</u> does not supply the deficiencies of <u>Hunter</u>.

In view of the above arguments, the alleged combination of <u>Hunter</u> and <u>Stern</u>, taken singly or in combination, does not disclose or teach the recitations of claim 8. Therefore, the rejection of claim 8 should be withdrawn. Also, the rejection of claims 9-11, which incorporation the limitations of claim 8, should also be withdrawn for at least the same reasons given for claim 8.

CONCLUSION

The Examiner requested in the Office Action that a certified English translation of the Korean priority document 2003-12779 be provided in order to perfect the claim of priority and rule out the use of U.S. Patent Publication No. 2004/0147255 to <u>Lee</u> as an intervening reference. A certified English translation of the priority document is submitted along with this amendment in order to perfect priority.

Applicants submit that the above arguments are fully responsive to the Office Action dated May 14, 2007 and respectfully requests the asserted grounds of rejections be withdrawn based on such arguments.

In view of the above, it is believed that the above-identified application is in condition for allowance, and notice to that effect is respectfully requested. Should the Examiner have any questions, the Examiner is encouraged to contact the undersigned at the telephone number indicated below.

Respectfully submitted,

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